## Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

## the Wolfsberg Group

Financial Institution Name: Location (Country) : Finint Private Bank S.p.A. Milano, (Italy)

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	Finint Private Bank S.p.A.
2	Append a list of foreign branches which are covered by this questionnaire	N/A
3	Full Legal (Registered) Address	Corso Monforte, 52 20122 Milano (MI) Italy
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/establishment	13/09/1999
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	UBOs: Enrico Marchi, Giovanni Marchi, Margherita Marchi, Virginia Marchi, Benedetta Marchi, Emanuela Seguso, Alessandro Belluzzo, Luigi Belluzzo, Lino De Luca, Oliviero Edoardo Pessi. Additional UBOs with a 10% threshold: Perin Andrea, Perin Paolo, Perin Pietro, Perin Miriam Sulekha
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	Yes
10	Name of primary financial regulator/supervisory authority	Bank of Italy
11	Provide Legal Entity Identifier (LEI) if available	8156002C3FA08E482831
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A

3     Detroits a point     Image and the point of an integration of a second of the point of a second of the point of the poin	13	Jurisdiction of licensing authority and regulator of	
14     Select the business areas applicable to the Entry     Yes       14     Retaining     Yes       14     Protein Estanting     Yes       14     Transactional Banking     Yes       14     Financial Banking     Yes       14     Maillakeral Development Banking     Yes       14     Maillakeral Development Banking     Yes       14     Maillakeral Development Banking     Yes       15     Does the Ently have a significant (10% or more)     No       16     Torgodie the boft hour constaint catabrees to no more sident	15		Italy
14 a     Peter Banking     Yes       14 b     Provide Banking     Yes       14 c     Commercial Banking     Yes       14 c     Commercial Banking     Na       14 c     Investment Banking     Yes       14 c     Mathiased Development Bank     No       14 c     Mathiased Development Bank     No       14 c     Mathiased Development Bank     Yes       14 c     Other (please explaint)     Yes       14 d     Other (please explaint)     Yes       14 development     Yes     Advisory and services, securitisation       15 a     If Y: provide model on the non-statem customers or does id derive model on the non-statem customers are located.     No       16 a     Secure Ha closed value:     201-000       17 a     If N: provide the top fore currifies where the non-resident customers are located.     Yes       18 a     Family have a significant (10% or more) point on the non-state closed value:     201-000       18 a     Family have a significant (10% or more) point on the non-state closed value:     201-000       18 a     Contemportal sector on the non-state closed value:     201-000       19 a		ulumate parent	
14 a     Peter Banking     Yes       14 b     Provide Banking     Yes       14 c     Commercial Banking     Yes       14 c     Commercial Banking     Na       14 c     Investment Banking     Yes       14 c     Mathiased Development Bank     No       14 c     Mathiased Development Bank     No       14 c     Mathiased Development Bank     Yes       14 c     Other (please explaint)     Yes       14 d     Other (please explaint)     Yes       14 development     Yes     Advisory and services, securitisation       15 a     If Y: provide model on the non-statem customers or does id derive model on the non-statem customers are located.     No       16 a     Secure Ha closed value:     201-000       17 a     If N: provide the top fore currifies where the non-resident customers are located.     Yes       18 a     Family have a significant (10% or more) point on the non-state closed value:     201-000       18 a     Family have a significant (10% or more) point on the non-state closed value:     201-000       18 a     Contemportal sector on the non-state closed value:     201-000       19 a			
14 a     Peter Banking     Yes       14 b     Provide Banking     Yes       14 c     Commercial Banking     Yes       14 c     Commercial Banking     Na       14 c     Investment Banking     Yes       14 c     Mathiased Development Bank     No       14 c     Mathiased Development Bank     No       14 c     Mathiased Development Bank     Yes       14 c     Other (please explaint)     Yes       14 d     Other (please explaint)     Yes       14 development     Yes     Advisory and services, securitisation       15 a     If Y: provide model on the non-statem customers or does id derive model on the non-statem customers are located.     No       16 a     Secure Ha closed value:     201-000       17 a     If N: provide the top fore currifies where the non-resident customers are located.     Yes       18 a     Family have a significant (10% or more) point on the non-state closed value:     201-000       18 a     Family have a significant (10% or more) point on the non-state closed value:     201-000       18 a     Contemportal sector on the non-state closed value:     201-000       19 a			
14 b     Private Burxing     Yes       14 c     Connectual Banking     Yes       14 d     Transactional Banking     No       14 d     Transactional Banking     Yes       14 d     Private Banking     Yes       14 d     Private Banking     Yes       14 d     Banking Structures Structures Custody     Yes       14 m     Banking Structures	14	Select the business areas applicable to the Entity	
14 c     Commercial Banking     No       14 d     Transactional Banking     No       14 e     Investment Banking     Yes       14 e     Investment Banking     Yes       14 e     Transactional Banking     Yes       14 e     Rescherbalter     No       14 B     Securities Sanking     No       14 B     Banking     No       14 B     Banking     No       14 B     Multitational Development Bank     No       14 J     Weak Management     Yes       15 C     Des the Ently have a significant (10% or more) portfolio of non-resident customers or does it derive more than a different juscification to the location of the location	14 a	Retail Banking	Yes
14 d     Transactional Banking     No.       14 for the intermed Banking     Yes       14 for Financial Markes Trading     Yes       14 for Financial Markes Trading     Yes       14 g     Sectores Services Clubdy     Yes       14 hours and the sectores Services Clubdy     Yes       14 hours and the sectores Services Clubdy     Yes       14 hours and the sectores Services Clubdy     Yes       15 controls of non-resident functioners or does it derive more han 10% of lar evenue from non-resident customers or does it derive more han 10% of lar evenue from non-resident customers are located.     No       15 a     If y. provide the top the countries where the non-resident customers are located.     No       16 Select the dosest value:     Select the dosest value:     No       17 Confirm that if responses provided in the above Selection are appresentative of all the Lie b branches.     Yes       18 Market of the followers in the selection.     Yes       19 Total Assets     Gener the followers in the selection.       18 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes    <	14 b	Private Banking	Yes
14 d     Transactional Banking     No.       14 for the intermed Banking     Yes       14 for Financial Markes Trading     Yes       14 for Financial Markes Trading     Yes       14 g     Sectores Services Clubdy     Yes       14 hours and the sectores Services Clubdy     Yes       14 hours and the sectores Services Clubdy     Yes       14 hours and the sectores Services Clubdy     Yes       15 controls of non-resident functioners or does it derive more han 10% of lar evenue from non-resident customers or does it derive more han 10% of lar evenue from non-resident customers are located.     No       15 a     If y. provide the top the countries where the non-resident customers are located.     No       16 Select the dosest value:     Select the dosest value:     No       17 Confirm that if responses provided in the above Selection are appresentative of all the Lie b branches.     Yes       18 Market of the followers in the selection.     Yes       19 Total Assets     Gener the followers in the selection.       18 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes       19 Automet of the followers in the selection.     Yes    <	14 c	Commercial Banking	Yes
14 e     Investment Banking     Yes       14 F     Finding Market Trianding     Yes       14 g     Securities Services/Clubdy     Yes       14 B     Securities Services/Clubdy     Yes       14 B     Multiatisme Development Bank     No       14 W     Multiatisme Development Bank     No       14 West Management     Yes       14 West Management     Yes       15 Does the Entity thave a significant (10% or more)     advisory and services; securitisation       16 West Management     Yes       17 A     Try and that disation to face site of the second	14 d	Ç.	No
14 f     Financial Markes Trading     Yes       14 g     Securities Services/Loody     Yes       14 m     Broker/Dealer     No.       14 M     Broker/Dealer     No.       14 M     Weath Management     Yes       14 M     Other (please explain)     advicory and service; securitisation       15 Does the Entity have a significant (10% or more) portfolic of non-resident customers or does it derive more than the services are provided in the above and provided in the service in the service in the service is adviced and the service is adviced andviced and the service is adviced and the service is advic	-	0	
14 g     Securities Services/Custody     Yes       14 h     Boxier/Dasier     No.       14 h     Multifietra Development Bank     No.       14 W     Multifietra Development Bank     No.       14 West Management     Yes       14 West Management     Yes       14 West Management     Yes       15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive resident in a different juricidion to the toration where bank services are provided in where bank services are provided in the top five countries where the non- resident customers are located.     No.       16 Select the dosest value:     201-500       17 a     If Y, provide the top five countries where the non- resident customers are located.     No.       18 a     Number of amployees     201-500       19 Top to the soft of the top five countries where the non- resident customers are located.     Yes       19 a     Conferm that all responses provided in the above Section are representable.     Yes       19 a     Conferm that all responses to all the LEV boxed services.     Yes       19 a     Does the Entity offer the following products and services.     No.       19 a     Conferm that all services are provided in services.     No.       19 at a     Does the Entity offer Correspondent Banking services.     Pease select.       19 at a     Does the Entity offer Correspondent Banking s			
14 h     Broker/Dealer     No       14 J     Multillerin Development Bank     No       14 J     Wealth Management     Yee       14 M     Other (please explain)     advitory and services; securitation       15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its resource from non-resident customers or does it derive more than 10% of its resource from non-resident customers primary where bank services are provided)     No       16 To Tolk Asster     201-000     NA       16 Safect the closest value:     201-000       17 a     Fit, provide the tap for countries where the non-resident customers privately to and response provided in the above Sacchard are representative of all the LES branches.       16 To Tolk Asste     Greater than 500 of its representative of all the LES branches.       17 a     If Appropriate, provide and the presentative of all the LES branches.       18 mitomation/context to the answers in this section.     Yes       19 Does the Entity offer Correspondent Banking     No       19 Does the Entity offer Correspondent Banking     Pease select       19 To top the bank offer Correspondent Banking     Pease select       19 and     Does the Entity offer Correspondent Banking     Pease select       19 and     Does the Entity offer Correspondent Banking     Pease select       19 and     Does the Entity offer Correspondent Banking     Pease select			
141     Multilation Development Bank     No.       14     Weith Management     Yes       14 K     Other (please explain)     advisory and services; securitisation       15     Does the Entity have a significant (10% or more) portfolio of non-resident customers? (Non-resident transan submests primarity resident in a different jurisdiction the incendon where bank services are provided)     No       15 a     If Y provide the top five currities where the non- resident customers are located.     NA       16     Select the closest value:     21-500       17 a     If A (arrity wind) questions the differences relate to and the branchues that this applies to.     NA       18     No     Contemportes provided in the above Section are representative of all the LS branches.       17 a     If A (arrity wind) questions the differences relate to and the branchues that this applies to.       18     If appropriate, provide any additional information/context to the answers in this section.       18     Correspondent Banking     No       19 a     Correspondent Banking     No       19 a     Correspondent Banking     No       19 at     Opes the Entity offer Correspondent Banking     No       19 at     Correspondent Banking     Please select       19 at     Does the Entity offer Correspondent Banking services to domasking where processes and procedures in place tolefatty downsharen relationships with domestic banks?     Please s			Yes
14     Weath Management     Yes       14 k     Other (please explain)     advisory and services: securituation       15     Does the Entity, have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its result for customers primarily resident in a different justocient on the customers primarily where bank services are provided)     No       16 a     Steled the closed value:     Does the Entity hove a significant (10% or more) portfolio of non-resident customers are located.     NA       16 a     Seled the closed value:     Does the Entity hove a significant (10% or more) portfolio are provide and the provide and the provention of the customers are located.     NA       17 a     Number of framploynes     Does the Entity of the customers are located.     NA       18 b     Total Arease and the branchies that this applies to.     Denate than 5500 million     Denate than 5500 million       17 a     If N, clarify which questions the difference's reliate to and the branchies that this applies to.     No     Denate than 5500 million       18 b     Gorrespondent Banking services to domesic bank?     No     Denate the fill of the fill of the fill of the analyses and procedures and the branchies that this applies to hank?     No       19 at 10     Does the Entity offer Correspondent Banking services to domesic bank?     Pease select       19 at 11     Does the Entity offer Correspondent Banking services to domesic bank?     Pease select       19 at 14     Do	14 h	Broker/Dealer	No
14 k     Other (please explain)     advisory and services; securitisation       15     Does the Entity have a significant (10% or more) potbilic of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction the incoton where bank services are provided)     No       15 a     If Y, provide the top five countries where the non- resident customers are located.     NiA       16     Select the closest value:     21-500       17 a     Total Assets     Greater than 5500 million       17 a     If All Assets     Greater than 5500 million       17 a     If All Assets     Greater than 5500 million       18 b     Total Assets     Greater than 5500 million       17 a     If Appropriate, provide any additional information/context to the answers in this section.     Yee       18 d     Happropriate, provide any additional information/context to the answers in this section.     No       18 d     Correspondent Banking services it domestic bank?     No       19 a     Opes the Entity offer Correspondent Banking services it domestic bank?     Pease select       19 a1 d     Ve     Pease select       19 a1 d     Does the Entity offer Correspondent Banking services to domestic bank?     Pease select       19 a1 d     Does the Entity offer Correspondent Banking services to domestic bank?     Pease select       19 a1	14 i	Multilateral Development Bank	No
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15 a       If Y, provide the top five countries where the non-resident customers are located.       NA         16       Select the closest value:       201-500         18 b       Total Assets       Greater than \$500 million         17       Confirm that all responses provided in the above Section are representative of all the LE's branches.       Yes         17 a       If Appropriate, provide any additional information(context to the answers in this section.       Yes         18       If appropriate, provide any additional information(context to the answers in this section.       No         19       Does the Entity offer Correspondent Banking       No         19 at 1       Does the Entity offer Correspondent Banking, Provide downstream relationships?       Please select         19 at 1       Does the Entity offer Correspondent Banking, Please select       Please select         19 at 1       Does the Entity offer Correspondent Banking, Please select       Please select         19 at 2       Does the Entity offer Correspondent Banking, Please select       Please select         19 at 3       Does the Entity offer Correspondent Banking, Please select       Please select         19 at 4       Does the Entity offer Correspondent Banking, Please select       Please select         19 at 5       Does the Entity offer Correspondent Banking, Please select       Please select         19 a		resident in a different jurisdiction to the location	
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19 a1e       Does the Entity allow downstream relationships with foreign banks?       Please select         19 a1f       Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?       Please select         19 a1g       Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?       Please select         19 a1h       Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?       Please select         19 a1h1       MSBs       Please select         19 a1h2       MVTSs       Please select			Please select
with foreign banks?     Please select       19 alf     Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?     Please select       19 alg     Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?     Please select       19 alh     Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?     Please select       19 alh1     MSBs     Please select       19 alh2     MVTSs     Please select	19 210	5	
19 a1f       Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?       Please select         19 a1g       Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?       Please select         19 a1h       Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?       Please select         19 a1h1       MSBs       Please select         19 a1h2       MVTSs       Please select	13 418	3	Please select
in place to identify downstream relationships with foreign banks?     Please select       19 a1g     Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?     Please select       19 a1h     Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?     Please select       19 a1h1     MSBs     Please select       19 a1h2     MVTSs     Please select		-	
foreign banks?     Index status       19 a1g     Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?     Please select       19 a1h     Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?     Please select       19 a1h1     MSBs     Please select       19 a1h2     MVTSs     Please select	19 a1f		
19 a1g       Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?       Please select         19 a1h       Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?       Please select         19 a1h1       MSBs       Please select         19 a1h2       MVTSs       Please select			Please select
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?     Please select       19 a1h     Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?     Please select       19 a1h1     MSBs     Please select       19 a1h2     MVTSs     Please select		foreign banks?	
services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?     Please select       19 a1h     Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?     Please select       19 a1h1     MSBs     Please select       19 a1h2     MVTSs     Please select	19 a1a	Does the Entity offer Correspondent Banking	
I9 a1h     MSBs       19 a1h1     MSBs       19 a1h2     MVTSs       19 a1h2     MVTSs			Please select
19 a1h       Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?         19 a1h1       MSBs         19 a1h2       MVTSs         19 a1h2       MVTSs			Please select
with MSBs, MVTSs, or Payment Service Provider (PSPs)?     Please select       19 a1h1     MSBs     Please select       19 a1h2     MVTSs     Please select	10 1		
(PSPs)?       19 a1h1     MSBs       19 a1h2     MVTSs       Please select	19 a1h		
19 a1h1     MSBs     Please select       19 a1h2     MVTSs     Please select			
19 a1h2     MVTSs     Please select		(PSPs)?	
19 a1h2     MVTSs     Please select	19 a1h1	MSBs	Please select
Please select			
	19 01113	1013	ר ובמשב שבופרו

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Please select
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	
	,	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Due diligence
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Due diligence
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Due diligence
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	Due diligence
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	Not Applicable
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML. C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
	AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22	Sanctions	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	In a general perspective, pursuant to the applicable regulations, in some cases the Bank accepts KYC certifications by other financial institutions/operators; referring to the servicer business line, there are cases in which the KYC documents are collected by credit collection agents.
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
42 e 42 f	subject to ABC risk have been outsourced Non-employed workers as appropriate	No
	(contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML. C	F & SANCTIONS POLICIES & PROCEDURES	
	F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures	
5. AML, C1 46	F & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	Yee
46 46 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering	Yes
46 46 a 46 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing	Yes
46 46 a 46 b 46 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations	
46 46 a 46 b 46 c 47	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually?	Yes
46 46 a 46 b 46 c 47 48	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes
46 46 a 46 b 46 c 47 48 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes No
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes No
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No Please select
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes No Please select Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes No Please select Yes
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 48 b 49	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	Yes Yes Yes No Please select Yes No
46 46 a 46 b 46 c 47 48 48 a 48 a 48 a 48 a 48 b 48 b 49 49 a	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes Yes Yes No Please select Yes No
46         46 a         46 b         46 c         47         48 a         48 a1         48 b1         49 a         49 b         49 c	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes Yes Yes No Please select Yes No Yes Yes Yes
46         46 a         46 b         46 c         47         48 a         48 a1         48 b1         49 a         49 b         49 c         49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes Yes Yes No No Yes Yes Yes
46         46 a         46 b         46 c         47         48 a         48 a1         48 b1         49 a         49 c         49 d         49 d         49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks	Yes Yes Yes No Please select Yes No Yes Yes Yes
46         46 a         46 b         46 c         47         48 a         48 a1         48 b1         49 d         49 c         49 d         49 e         49 f	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	Yes Yes Yes Yes No Yes Yes Yes Yes
46         46 a         46 b         46 c         47         48 a         48 a1         48 b1         49 a         49 c         49 d         49 d         49 d	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: Money laundering Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit dealing with another entity that provides services to shell banks	Yes Yes Yes Yes No Yes Yes Yes Yes Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by	Yes
	employees	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6. AML. CTF	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Ves
	Does the Entity's AML & CTF EWRA cover the	Yes Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 55 d 55 a 55 a 55 b 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 c           55 d           55 c           55 c           55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 c           55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54           54 a           54 b           54 c           55 a           55 b           55 c           55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 c           55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54           54 a           54 b           54 c           54 d           55 a           55 a           55 b           55 c           55 d           55 f           55 f           55 g           55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 f           55 g           55 h           56 a           56 a           57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 c           55 d           55 f           55 g           55 h           56           56 a           57           57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54           54 a           54 b           54 c           54 c           55 a           55 a           55 b           55 c           55 d           55 c           55 d           55 f           55 g           56           56           57           57 a           57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF EWRA was completed.         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product	Yes
54           54 a           54 b           54 c           55 a           55 b           55 c           55 d           55 c           55 d           55 f           55 g           56           56           56           57           57 a           57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes         Yes
54           54 a           54 b           54 c           55 a           55 b           55 b           55 c           55 d           55 f           55 g           55 h           56           56           57 a           57 c           57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF EWRA was completed.         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 c           55 d           55 c           55 d           55 f           55 g           55 h           56           56           57           57 a           57 d           58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:         Transaction Monitoring         Customer Due Diligence         PEP Identification         Transaction Screening         Name Screening against Adverse Media/Negative News         Training and Education         Governance         Management Information         Has the Entity's AML & CTF EWRA been completed in the last 12 months?         If N, provide the date when the last AML & CTF EWRA was completed.         Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:         Client         Product         Channel         Geography         Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 d           55 f           55 g           55 h           56           56           57 a           57 a           57 d           58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 c           55 d           55 f           55 g           55 h           56 a           57 c           57 d           57 d           57 d           58 a           58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes         Yes
54           54 a           54 b           54 c           54 d           55 a           55 b           55 c           55 d           55 d           55 f           55 g           55 h           56           56           57 a           57 a           57 d           58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes

		· · · · · · · · · · · · · · · · · · ·
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in	Yes
	the last 12 months?	Tes
59 a	If N, provide the date when the last Sanctions	
	EWRA was completed.	
60	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional	
01	information/context to the answers in this section.	
	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	
64	Which of the following does the Entity gather and	
	retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
••• u	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
		Reputational Analysis
69	For high rick non-individual quatername in a site station	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
<u> </u>		
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to	
	screening customers for Adverse Media/Negative	Yes
	News?	
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	To event in case of specific risk factors.
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	
		EDD on risk-based approach
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	EDD on risk-based approach
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 u 76 v	Unregulated charities	
76 V 76 W	Used Car Dealers	EDD on risk-based approach
		EDD on risk-based approach
76 x 76 y	Virtual Asset Service Providers Other (specify)	EDD on risk-based approach N/A
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Every type of transaction is monitored both manually and automatically
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	AML System e Gianos, provided by Cabel Industry; Pythagoras provided by BERMA (DEDA Group) and SH-Detection System provided by SADAS s.r.l.
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9. PAYMEN	IT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
02 0		
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	EU regulation n. 2015/847 repealing EC regulation n.1781/2006.
93 c	lf N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	No
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	No
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Please select
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	CTIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Νο
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	World-CheckList provided by Cabel Industry and Pythagoras provided by BERMA (DEDA Group).
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105 Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	
106 Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and ber	eficial owners and for filtering transactional data
106 b United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Used for screening customers and ber	eficial owners and for filtering transactional data
106 c Office of Financial Sanctions Implementation HMT (OFSI) Used for screening customers and ber	eficial owners and for filtering transactional data
106 d European Union Consolidated List (EU) Used for screening customers and ber	eficial owners and for filtering transactional data
106 e Lists maintained by other G7 member countries Used for screening customers and ber	eficial owners and for filtering transactional data
106 f Other (specify) Every list selected by "World Check Li	t".
107 When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a Customer Data After 6 or more business days	
107 b Transactions After 6 or more business days	
108       Does the Entity have a physical presence, e.g.         branches, subsidiaries, or representative offices         located in countries/regions against which UN, OFAC,         OFSI, EU or G7 member countries have enacted         comprehensive jurisdiction-based Sanctions?	
109 Confirm that all responses provided in the above Section are representative of all the LE's branches Yes	
109 a       If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110     If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINING & EDUCATION	
111 Does the Entity provide mandatory training, which includes:	
111 a Identification and reporting of transactions to government authorities Yes	
111 b     Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered     Yes	
111 c         Internal policies for controlling money laundering, terrorist financing and sanctions violations         Yes	
111 d New issues that occur in the market, e.g. significant regulatory actions or new regulations Yes	
111 e Conduct and Culture Yes	
111 e     Conduct and Culture     Yes       111 f     Fraud     Yes	
111 e     Conduct and Culture     Yes       111 f     Fraud     Yes       112     Is the above mandatory training provided to:     Image: Conduct and Culture	
111 e     Conduct and Culture     Yes       111 f     Fraud     Yes       112     Is the above mandatory training provided to:     Yes       112 a     Board and Senior Committee Management     Yes	
111 e     Conduct and Culture     Yes       111 f     Fraud     Yes       112     Is the above mandatory training provided to:     Yes       112 a     Board and Senior Committee Management     Yes       112 b     1st Line of Defence     Yes	
111 e     Conduct and Culture     Yes       111 f     Fraud     Yes       112 ls the above mandatory training provided to:     Yes       112 a     Board and Senior Committee Management     Yes       112 b     1st Line of Defence     Yes       112 c     2nd Line of Defence     Yes	
111 e     Conduct and Culture     Yes       111 f     Fraud     Yes       112     Is the above mandatory training provided to:     Yes       112 a     Board and Senior Committee Management     Yes       112 b     1st Line of Defence     Yes	
111 e     Conduct and Culture     Yes       111 f     Fraud     Yes       112 Is the above mandatory training provided to:     Image: Comparison of Committee Management     Yes       112 a     Board and Senior Committee Management     Yes       112 b     1st Line of Defence     Yes       112 c     2nd Line of Defence     Yes       112 d     3rd Line of Defence     Yes       112 e     Third parties to which specific FCC activities have been outsourced     Not Applicable	
111 eConduct and CultureYes111 fFraudYes112 Is the above mandatory training provided to:Is112 Is the above mandatory training provided to:Yes112 Is the of DefenceYes112 Is the of DefenceYesIntervalThird parties to which specific FCC activities have been outsourcedNot ApplicableNot Applicable	
111 e       Conduct and Culture       Yes         111 f       Fraud       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training that is targeted to specific FCC activities have been outsourced       Yes         112 f       Non-employed workers (contractors/consultants)       Not applicable         113       Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and Yes       Yes	
111 e       Conduct and Culture       Yes         111 f       Fraud       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provided to:       Yes         112 ls the above mandatory training provide the provide addition of the provide set to the provide the provide addition of th	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY	ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
13. AUDII 121	In addition to inspections by the government	
121	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component-based reviews
123 123 a	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f 123 g	Reporting/Metrics & Management Information Suspicious Activity Filing	Yes
123 g 123 h	Technology	Yes Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

129	Does the Entity have real time monitoring to detect fraud?	No
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	No
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement		
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)		
Finint Private Bank S.p.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, <u>Chief Executive Officer - Marangi Antonio</u> (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
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Firmato digitalmente da: PERILLI GAETANO Data: 19/12/2023 18:07:49 (Signature & Date)		